

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

Cequent Performance
Products, Inc.,

Plaintiff,

v.

Hopkins Manufacturing
Corporation et al.,

Defendants.

Case No.

2:13-cv-15293-MFL-PJK

Judge Matthew F. Leitman

**Cequent's Motion to File Under Seal a Confidential
Version of Opening Claim Construction Brief and Exhibit F**

In accordance with Local Rule 5.3 and Paragraph 7 of the Stipulated Protective Order in this case (ECF # 22), Cequent Performance Products, Inc. moves the Court for leave to file under seal a confidential version of its Opening Claim Construction Brief and Exhibit F to that Brief.

In accordance with Local Rule 7.1(a), the undersigned asked counsel for defendant Hopkins Manufacturing Corporation whether Hopkins concurred with this request. While Hopkins has not responded as of the time of this filing, Cequent expects that Hopkins does not oppose the filing of these documents under seal for it is Hopkins that has designated the materials as "Attorneys' Eyes Only" and, by doing so, required that those materials be filed under seal.

Paragraph 7 of the Protective Order states: “Any material that is designated for protection under this Order shall be filed with the Court under seal in accordance with E.D. Mich. Local Rule 5.3 and shall remain under seal until further Order by the Court.” Again, Hopkins designated the materials subject to this motion as protected by the Stipulated Protective Order. Therefore, Cequent requests leave allowing it to file Exhibit F and a Confidential Version of Cequent’s Opening Claim Construction Brief that describes the contents of Exhibit F. In accordance with Paragraph 7 of the Protective Order, Cequent has prepared and filed as ECF # 42 a “Public Version” of its Brief with the references to ATTORNEYS EYES ONLY material redacted.

For the foregoing reasons, the Court should enter an order authorizing that the Confidential Version of Cequent’s Opening Claim Construction Brief and Exhibit F to that Brief be filed under seal. A proposed order is being submitted through the Court’s ECF system contemporaneously with the filing of this motion.

Respectfully submitted,

Dated: June 15, 2016

s/ Matthew J. Cavanagh
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Certificate of Service

I hereby certify that on June 15, 2016, I electronically filed the foregoing paper with the Clerk of Court using the ECF system, which will send notification of such filing to all counsel of record, all of whom are registered ECF participants.

s/ Matthew J. Cavanagh
Counsel for
Cequent Performance Products, Inc.